

the “Act”). APSS seeks to intervene as a defendant-intervenor in this action. I am knowledgeable of the facts set forth herein, am duly authorized to make this declaration on behalf of APSS, and if called to testify would do so, as follows.

2. My educational background, work experience and other qualifications to serve in my current capacity as APSS’ Chief Executive Officer are set forth in my current resume, a true and correct copy of which is attached as EXHIBIT A hereto and incorporated herein by this reference.

3. APSS was founded in 1981, originally under the name of Birthright of Asheville. In March of 1994 APSS, still under its current incorporation, changed its business name to its current name. At all relevant times the mission of APSS is and has been to care for, encourage, and educate women and men at risk for, or impacted by, an unplanned pregnancy.

4. Our services include: Free pregnancy testing; Peer counseling, guidance and support; Material support including maternity clothing, baby items, and emergency supplies of diapers and formula; Referrals to other community resources, including medical care; and post abortion support group studies.

5. In December 2006, with the assistance of Focus on the Family’s Option Ultrasound Program, APSS expanded its services to include free limited obstetrical ultrasounds complete with audible Doppler to detect and amplify embryonic of fetal heart tones

6. With the addition of the ultrasound our client visits grew by 40% as women sought information about their baby in the early stages of their pregnancy. Since 2007 APSS' service statistics include the following:

	<u>CLIENT VISITS</u>	<u>PREGNANCY TESTS</u>	<u>ULTRASOUNDS</u>
2007	1422	587	246
2008	1511	599	256
2009	1432	619	256
2010	1157	532	236
2011 thru 10/27/11	832	404	207

7. All of our medical services are directly provided by one of APPS' two medical doctors, both of whom are obstetrician/gynecologists who are board-certified by the American Board of Obstetrics and Gynecology; registered nurses trained and tested for competency, with follow up skills assessment every 6 months, in limited obstetrical ultrasound, or a registered diagnostic medical sonographer certified in obstetrics and gynecology by the American Registry of Medical Sonography (ARMDS). All medical personnel work under the supervision and standing medical orders of our Medical Directors who is also an obstetrician/gynecologist board-certified by the American Board of Obstetrics and Gynecology

8. One of the purposes for which we exist is to assure that every woman facing an unplanned pregnancy is provided with all the information about all the options that she has as she considers how to proceed with her pregnancy. With respect to the option of

terminating her pregnancy through induced surgical or medical abortion, we are particularly qualified and concerned to make sure that before any woman gives her consent to a non-emergency induced abortion she is fully informed and is able to make a completely voluntary decision. Accordingly, we are well qualified and very experienced in providing to such women all the information regarding the medical risks of the procedure and the adverse consequences that may proceed from it. In addition to this information, we accurately and professionally provide to such women all of the information that is required to be provided by the Act being challenged in this action. Using limited obstetric ultrasonography designed to determine the presence of a an intrauterine pregnancy, we also provide a obstetric real-time view of the image of every woman's unborn child, including the auscultation of the fetal heart tone, while explaining to the woman what this image and heart tone is medically depicting, just as is required by the Section 90-21.85 of the Act being challenged in this action.

9. Given the above-described services we provide, including limited ultrasound, we commonly serve women who have been referred to us by one of the plaintiffs in this case who do not provide abortion services in our area, as well as by Femcare, the sole abortion provider in Western North Carolina, for the purposes of providing these women with information regarding all of their options, including the information and service described in paragraph 8 above.

10. In anticipation of the Act becoming effective on October 26, 2011, APSS has entered into a collaborative agreement with Femcare whereby APPS, as we are qualified

to do under the Act, may perform informed consent certifications required under the Act for clients referred to APSS by FEMCARE for such certification. Therefore, we are vitally interested in all of the provisions of the Act going into full force and effect because such effectiveness promises to significantly increase our referrals from FEMCARE, as well as from other sources, and our opportunity to make sure that all women who decide to terminate their pregnancy or carry it to term have done so only after receiving all the information they need to make a fully informed and voluntary decision, including a medically accurate description of the ultrasound real time images and fetal heart tones of each woman's unborn child.

11. Since January 2007 thru October 27, 2011 APSS has performed 1,201 ultrasounds. Each client is given the opportunity to answer an exit questionnaire after their ultrasound. In the surveys taken only 265 women, or roughly 22%, answered NO to the question: *"Did the ultrasound provided influence your decision regarding this pregnancy?"* The ultrasound indeed does make a difference. For those who indicated that the ultrasound did not influence their decision, the vast majority so stated because they had already determined to carry to term before they had the abortion. Women are also asked: *"What information did you gain from the ultrasound?"* Some of the responses include:

- *"the heart starts beating at 5 weeks"*
- *"my baby is a life"*
- *"at 8 weeks, I did not know he/she was developed so humanlike"*
- *I was 8 weeks and 5 days. . . the baby was active"*

- “the baby is alive”
- “rethink my decision of abortion”

When responding to the question “*Did the ultrasound provided influence your decision regarding the pregnancy?*” responses have included:

- “Now that I have heard the heartbeat I know I can’t abort the pregnancy”
- “It was important to know as much as possible before making a decision”
- “helped me to see the baby and heartbeat so I could know it was real”
- “I am going to keep this baby!”

In these same surveys the overwhelming response is that our staff is “*very interested,*” “*very sensitive,*” “*very helpful,*” and the clients indicate they would “*strongly recommend*” us to a friend. It is clear from these responses that just the opportunity to talk to someone face to face, to explore their options with a caring and compassionate person, makes a tremendous difference in these women’s lives regardless of the decision they make.

12. With over 30 years of experience in working with thousands of women facing an unplanned pregnancy, for those who have chosen abortion in the past, the overwhelming consensus can be summarized in one statement: “*If only.*” One 5 year seasoned APSS client advocate has told me that in the hundreds of clients she has served “*only ONE woman ever expressed she had no regrets for choosing abortion.*” In my personal experience speaking with hundreds of post abortive women the regret falls into three

main categories: 1) the need for time to think through their options, 2) the need to have a safe place to go to talk through their options and 3) the need to have all the facts concerning their pregnancy, including an ultrasound that would have shown them the truth about the life they carried.

I have heard so many “If onlies”: *“if only I had known that the abortion would hurt emotionally so much, I never would have done it;” “If only I hadn’t had to make such a quick decision;” “If only I had felt that I had someone to talk to, someone who would help me;”* and *“If only I had had the opportunity of an ultrasound. . . I didn’t know it was a baby.”* One woman stated it so clearly *“If I had only seen a picture of my developing child, I believe my child would be alive today.”*

It is the regrets that torture many women for years following an abortion. It is a grief that forever changes so many of their lives. For those who never work through this grief their regretted decision impacts not only their life but the lives of those they love. Women whom we have seen and counseled at APSS report that they have experienced depression, some resulting in substance abuse and subsequent addiction; their attitudes toward children are changed; they have flashbacks, fits of uncontrollable crying, nightmares, and suicidal thoughts. Women also point to their past abortion as the cause of problems in relationships, including broken marriages.

No woman ever grew up wanting to have an abortion. For those who do not regret their decision it is because they made their decision after considering all the facts for all their options. They made a fully voluntary decision based on a fully informed consent.

13. Based upon APSS' and my own personal experience set forth above, as well as my interviews and discussion with hundreds of post-abortive women in North Carolina, I would conclude that abortionists in North Carolina, including at least some of the plaintiffs in this case, do not give women enough information for them to make a truly informed decision about what an abortion is and what risks and adverse complications can arise from abortion.

14. Because APSS believes that the number of clients it will be able to serve will significantly increase if all the provisions of the Act are implemented, and because APSS daily shares with the women we serve a number of facts and expert opinions that are directly contradicted by factual allegations and expert opinions that are being alleged and have already been offered in evidence by the plaintiffs and cited by the Court in this case, APSS seeks to intervene as a defendant-intervenor to protect its own legal interests advanced and protected by the Act, as well as to adjudicate the common issues of law and fact raised by the complaint in this matter. APSS will do nothing to unduly delay or

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prejudice the adjudication of the original parties' rights in this action.

I declare under penalty of perjury of the laws of the United States that the foregoing is true and correct. Executed on October 28, 2011.

/s/ Deborah D. Wood

Deborah D. Wood

prejudice the adjudication of the original parties' rights in this action.

I declare under penalty of perjury of the laws of the United States that the foregoing is true and correct. Executed on October 28, 2011.

A handwritten signature in cursive script, reading "Deborah D. Wood", is positioned above a horizontal line.

Deborah D. Wood

DEBORAH DREW WOOD

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CAREER OVERVIEW

Experienced Operations Manager with over 30 years leadership experience, over 15 years at the Executive level. Backed by a Masters in Operations Management, the experience includes non-profit leadership, financial and operational analysis; financial management and reporting; system design, development, implementation, and training; organizational turnarounds and re-engineering. Industry experience spans health care, social and financial services, education, government contracting, and manufacturing.

EXPERIENCE

ASHEVILLE PREGNANCY SUPPORT SERVICES Asheville, NC. APSS is a religious based non-profit reaching out to those at risk for, or impacted by an unplanned pregnancy. The organization was founded in 1981.

2005 – present *Chief Executive Officer*

Accomplishments

- Moved the organization from a primarily social services focused ministry to a professional medical clinic offering pregnancy tests and ultrasounds
- Developed new training program for volunteers resulting in a dramatic increase in the growth of the volunteer base and retention of trained volunteers (have 75+ volunteers working in the ministry each year)
- Secured the financial viability of the organization moving from a month to month survival mode to over 6 months in operational reserves
- Grew donor base by over 75%
- Developed a new fundraising program, including an upgraded Gala Banquet that has grown to over 500 guests each year and grosses in excess of \$110K in pledges and donations

FIRST at BLUE RIDGE, INC. Ridgecrest, NC. FIRST is a 85-bed residential recovery program serving men with substance abuse issues.

2004 – 2005 *Director of Administration and Finance*

Accomplishments

- Established accounting systems and currently maintain all aspects of Financial Operations for organization
- Developed operating budget including cash flow analysis and business plans for internal client run businesses
- Prepare and analyze financial reports for the Board of Directors
- Manage special projects

CITYTEAM MINISTRIES, San Jose, CA. Heritage Home is a residential program for pregnant women in crisis. The home offers food, clothing, shelter, counseling, education, and spiritual guidance to women who desire to begin a new life for themselves and their baby. Living in the home with the women this was a 24 hour a day, 7 day a week ministry.

2000 – 2002 *Director of Heritage Home*

Accomplishments

- Coordinated staff schedules and trained staff to better serve the clients
- Transitioned home from a shelter environment to a program offering services and guidance to clients based on their individual needs
- Solidified and expanded donor base resulting in revenue exceeding expenses each year
- Re-established local church support base
- Re-engineered organization to better serve the clients and at the same time reduce operating expenses by 20%
- Remodeled the kitchen using seed money, volunteers and donations; \$70K project completed for \$20K
- Recruited and developed volunteer groups
- Coordinated volunteer groups resulting in a complete refurbishing of the facility including room renovations, upgraded electrical service, complete landscaping, new heating system, and new laundry facilities
- Established a network with related agencies and services
- Chairman for annual dinner auction resulting in \$45K revenue raised for the ministry

COLUMBIA INTERNATIONAL UNIVERSITY, Columbia, SC.

1998 – 2000 *Assistant Director of College Admissions*

Accomplishments

- Recruited and counseled prospective students
- Represented the school at college fairs through out Florida, New York, Georgia, and the Carolinas
- Coordinated all College Days activities
- Implemented a customized recruitment tracking system and designed a training program for staff to expedite the adoption of the new system
- Project Manager for the development of individual websites for all College, Seminary, and Graduate School programs of study with the goal to increase enrollment

NATIONWIDE INSURANCE COMPANIES, Columbus, Ohio. Headquartered in Columbus, Nationwide Insurance Companies is one of the largest insurance and financial services providers in the United States.

1992 - 1994 *Systems Development Manager*
1990 - 1992 *Division Manager - Technical Support*

Accomplishments

- Managed staff of 35 including outside contract programmers
- Implemented a program control system to better meet customer design needs
- Established a team environment resulting in improved employee morale, reduced staff turnover, and improved departmental communication
- Facilitated organizational restructuring to better align staff skills with customer needs
- Coordinated the design and development of a laptop sales and automated enrollment system
- Developed laptop training programs for sales force

SOFTECH CORPORATION, Dayton, Ohio. SofTech designs and develops custom software and provides systems engineering and integration services.

1987 - 1990 *Senior Accounting Manager*

Accomplishments

- Designed and implemented a fully integrated computerized billing system
- Reduced delinquent receivables by negotiating favorable payment terms with government
- Analyzed operations and realigned functions to staff a new accounting division responsive to the needs of the organization

NAVISTAR CORPORATION, Springfield, Ohio. Navistar, formerly International Harvester Assembly Operations, is one of the nation's largest manufacturers of mid-size and heavy-duty trucks.

1983 - 1987 *Budgeting and Financial Management*
1977 - 1982 *Operations Analysis and Forecasting*

Accomplishments

- Established plant operating budgets and forecasts of expenditures in support of production schedules
- Computerized integration and consolidation of financial forecasts

COMMUNITY MENTAL HEALTH SERVICES, St. Clairsville, Ohio. CMHS is a non-profit agency providing comprehensive mental health care programs supporting the populations of Harrison, Belmont and Monroe counties in Ohio.

1982 - 1983 *Director of Finance*

Accomplishments

- Managed all areas of fiscal responsibility including payroll, billing, fee assessment, collections, purchasing, inventory control, financial reporting and forecasting
- Developed policies and procedures to assure accuracy and compliance with accepted accounting principles
- Computerized all general ledger and billing functions
- Implemented a new program accounting system

ADDITIONAL SKILLS

Word processing - Microsoft Word, WordPerfect

Spreadsheets - Microsoft Excel, Lotus, Supercalc

Database – Microsoft ACCESS

Blackbaud Razors Edge

Accounting Packages: Quickbooks and PeachTree Complete

With a background in software system design, to become proficient with each package's functionality generally requires screen orientation only.

EDUCATION

Master of Management Science, University of Dayton, Dayton, OH; 1985

Study Concentration: Business Administration

GPA: 3.8/4.0 scale

Bachelor of Science, Purdue University, W. Lafayette, IN; 1976

Dual Major: Mathematics Education and Economics

GPA: 5.9/6.0 scale (*graduated Phi Beta Kappa*)

OTHER ACTIVITIES

Volunteer Project Manager and Financial Analyst – Asheville Christian Academy (2003 – 2004)

Volunteer Consultant – Rescue Outreach Mission of Sanford, FL (2002 – 2003)

Volunteer Grant Writer – Christian HELP, Casselberry, FL

Volunteer with Servants on Wheels Ever Ready (SOWERS) a non-denominational ministry (1995-1997)

Volunteer Fund Raiser for Marysville Community Hospital, Marysville, OH

Board of Directors: Family Services Agency, Springfield, Ohio

Board of Directors: Nobody's Fool Classic Race benefiting American Cancer Society

Adjunct Instructor (Economics) - Adult Degree Program, Capital University, Columbus, OH